

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

STATE OF NEW JERSEY,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
TRANSPORTATION, FEDERAL HIGHWAY
ADMINISTRATION, SHAILEN BHATT, in
his official capacity as Administrator of the
Federal Highway Administration, and
RICHARD J. MARQUIS, in his official
capacity as Division Administrator of the New
York Division of the Federal Highway
Administration,

Defendants,

and

THE METROPOLITAN TRANSPORTATION
AUTHORITY and THE TRIBOROUGH
BRIDGE AND TUNNEL AUTHORITY,

Intervenor-Defendants.

Hon. Leo M. Gordon

No. 2:23-cv-03885-LMG-LDW

**NOTICE OF MOTION FOR LEAVE TO
WITHDRAW *PRO HAC VICE*
APPEARANCE OF RAYMOND P.
TOLENTINO**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on February 20, 2024, or as soon thereafter as counsel may be heard, Sive, Paget & Riesel, P.C., the attorneys for Intervenor-Defendants, the Metropolitan Transportation Authority and the Triborough Bridge and Tunnel Authority (collectively, “Intervenor-Defendants”), shall move, pursuant to Local Civil Rule 101.1(c)(5), before the Honorable Leo M. Gordon of the United States District Court, District of New Jersey, for leave to withdraw the *pro hac vice* appearance of Raymond P. Tolentino as counsel for Intervenor-Defendants in the above-captioned case.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4) no brief in support of this motion is necessary because (1) Intervenor-Defendants will continue to be represented by the remaining counsel of record from Sive, Paget & Riesel, P.C., and Kaplan Hecker & Fink LLP, and (2) Mr. Tolentino's withdrawal does not relate to any procedural or substantive legal issues raised in this matter.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is respectfully submitted herewith.

Dated: January 26, 2024

Respectfully submitted,

/s/ Daniel Chorost

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